IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF PUERTO RICO

In re:	Case No. 23-00462 (ESL)
AZURE DEVELOPMENT, INC.	Chapter 11
Debtor.	

JOINT MOTION FOR RESCHEDULING OF HEARING

TO THE HONORABLE ENRIQUE S. LAMOUTTE INCLÁN UNITED STATES BANKRUPTCY JUDGE:

COME NOW secured creditor Triangle Cayman Asset Company ("<u>Triangle</u>"), and Debtor Azure Development, Inc. ("<u>Azure</u>") (collectively, the "<u>Parties</u>") through their respective undersigned counsel, and respectfully submit this *Joint Motion for Rescheduling of Hearing* (the "<u>Joint Motion</u>"). In support of the Joint Motion, the Parties hereby respectfully state and pray as follows:

BACKGROUND

- 1. On April 7, 2023, Triangle filed a *Motion to Dismiss Chapter 11 Bankruptcy Case* or, In the Alternative, For Conversion to Chapter 7 (the "Motion to Dismiss"). See, Docket No. 29.
- 2. On April 13, 2023, the Court entered an Order (the "Order") scheduling, for May 2, 2023, a hearing (the "Hearing") respecting the Motion to Dismiss. See, Docket No. 36.
- 3. Pursuant to the Order, the Parties were also directed to file a report three (3) days prior to the date of the Hearing.
- 4. After the issuance of the Order, the undersigned, on behalf of each of the Parties, have met and conferred to discuss the possibility of rescheduling the Hearing to its earliest

available date from May 3, 2023, through May 12, 2023, excluding May 5th and the 8th, due to counsel for Triangle being outside of the jurisdiction until May 2, 2023.

WHEREFORE, the Parties hereby respectfully request that the Court enter an order rescheduling the Hearing to its earliest available date from May 3 through May 12, 2023, excluding May 5th and the 8th, and therefore extending the deadline to file the report to three (3) days prior to the date of the rescheduled Hearing.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on April 18, 2023.

WE HEREBY CERTIFY that on this same date, we filed this document using the CM/ECF filing system, which will send a copy to all counsel of record.

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